

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: JUL 31 1997

SUBJECT: Biological Technical Assistance Group Review
LE Carpenter/Dayco Site

FROM: Shari Stevens, Coordinator *SS*
Biological Technical Assistance Group (DESA-HWSB)

TO: Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section (ERRD-NJRB-S)

As you requested, we are providing the specific information that may be required to evaluate the potential for capping contaminated areas with soil at the LE Carpenter/Dayco Site located in Wharton Borough, Morris County, New Jersey.

The April 1994 Record of Decision (ROD) specified excavation of soils which contain elevated levels of lead. However, during the excavations it was discovered that the extent of contamination was greater than anticipated. Therefore, a change in the remedial action may be proposed.

In order to appropriately evaluate this potential proposal, the extent of lead contamination should be delineated. Reference soil concentrations from the area should also be provided. Since these hot spots areas are within the proximity of the Rockaway River, potential impacts to the River should be assessed. The effects of the river on the cap (i.e. flooding) should also be evaluated. Additionally, including information on the composition of the cap material will assist in the evaluation.

Further assessment of the drainage ditch may be necessary depending on the extent of the lead contamination. Based upon previous data it appears that this ditch may not have been adequately characterized. The elevated concentrations of lead and mercury detected in the sediments may be acting as a potential contaminant source to the Rockaway River.

In order to comply with federal wetlands ARARs, a wetlands assessment and restoration plan would be needed for any wetlands impacted or disturbed by contamination and/or remedial activities. Management practices (Federal Register Volume 51, No. 219, Part 330.6) should be implemented.

If you have any questions, comments, or require further information, please contact Michael Clemetson at (908) 321-6712.

cc: Carole Petersen, ERRD-NJRB
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OPTIONAL FORM 98 (7-90)

FAX TRANSMITTAL

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MEMORANDUM

TO: Michael Clemetson, USEPA Region II BTAG

THROUGH: Linda Cullen, Unit Supervisor, ETRA

THROUGH: Edward Demarest, Ph.D., Research Scientist, ETRA

FROM: Nancy Hamill, Research Scientist, ETRA *NEH 7/23/97*

SUBJECT: Comments on NJDEP request to revise the remedy outlined in the April 18, 1994 ROD for the LE Carpenter Site, Wharton, NJ: Review of (1) 1994, 1996, and 1997 Quarterly Progress Reports (2) Sediment Data from Supplemental Remedial Investigation Addendum, September, 1992

The referenced documents were forwarded by BTAG and reviewed in order to assist the EPA RPM in evaluating the NJDEP request to revised the referenced ROD. Specifically, the RPM requested BTAG to advise him if additional information is necessary to evaluate the proposed ROD changes from an ecological standpoint. The request for revision is based on additional data gathered during "hot spot" excavation which indicates elevated lead concentrations are more widespread than originally anticipated. The levels appear to be associated with historic fill and the location of the site within the Dover Mining District; naturally occurring iron ore would be a source of arsenic, copper, lead, and/or zinc. The original remedy included biological treatment of groundwater with reinfiltration and soil bioremediation, with "hot spot" removal of metal and PCB contaminated soil. The revised remedy calls for a soil cover of two feet in areas where lead concentrations exceed 600 ppm. Prior BTAG involvement with this site consisted of the review of two documents: the 1991 Revised RI and Draft Baseline Risk Assessment (BTAG memorandum 6/91) and the 1993 Rockaway River Sediment Ecological Assessment (BTAG memorandum 1/93). A site visit was conducted by BTAG members on June 17, 1997.

A. Background/Summary of Ecological Studies

The L.E. Carpenter Site is a 14.6 acre site where vinyl wall covering was manufactured from 1943 to 1987. The site is located within the Dover Mining district, where iron ore was extracted from three mines between the mid-1800s and early 1900s. The major water bodies associated with the site are the Rockaway River, which forms the southern border, and the Air Product Ditch, which borders the property to the northeast and drains to the Rockaway River. Base

neutrals and metals were quantified in sediments from both water bodies above sediment quality guidelines.

In order to supplement the findings of the Baseline Risk Assessment, a benthic macroinvertebrate survey and aquatic/riparian habitat evaluation were conducted at three locations in 1991 to determine whether contaminants in river sediments adversely impacted this community. Each metric determined was given a biological condition score based on percent comparability to the reference locations. When compared to reference location 1, sample location 2 was moderately impaired, locations 3, 4, and 5 were slightly impaired, and location 6 was nonimpaired. When reference location 2 was used as the basis of comparison, all locations were non-impaired. The January 13, 1993 BTAG review memorandum on this ecological assessment concluded that reference location 1, rather than reference location 2, is more applicable for making comparisons to other sampling locations. According to the BTAG memorandum, although impairment is indicated, the impacts to the benthic community appeared minimal and did not warrant further investigations or remedial activities at that time. The assessment concluded that historic operations on-site were not adversely impacting the benthic community in the Rockaway River.

B. Comments

Conceptually the proposed soil cover should provide adequate protection against exposure of contaminants to ecological receptors, thus no additional information per se is required to evaluate the proposed ROD revision, assuming that hydrogeologic concerns have been addressed (i.e., depth to groundwater). However, maps indicating the extent of delineation to 600 ppm should be supplied with future documents.

While it is understood that the Air Products ditch is not associated with this ROD revision request, it is unclear whether contaminant levels in this ditch have been adequately characterized and considered for remediation. The Final Supplemental Remedial Investigation Addendum for L.E. Carpenter and Company, September, 1991, and 1991 sediment sampling in the Air Products ditch and Rockaway River, as well as results from RI and USGS background/reference samples. Lead and mercury are the primary contaminants of ecological concern, with concentrations in the two samples analyzed indicating exceedences of the Ontario Severe Effects Levels (SELEs). Maximum concentrations were indicated at location SS-6, a saturated area that may be a contaminant source to the ditch, which in turn could serve as a source to the Rockaway River. It is this reviewer's opinion that the ditch was inadequately characterized for site-related inorganic contamination, with only two out of four samples analyzed for these parameters. It is recommended that if any further sampling is done on this site that it include sampling for inorganics in the ditch; the potential for contaminant migration from location SS-6 to the ditch should be considered.

It must be noted that if impacts to wetlands have occurred from site-related contamination or are expected from remedial actions, an assessment of these impacts must be made and a wetlands mitigation and monitoring plan must be prepared and implemented.

Thank you for your consideration of these comments. Please contact me at 609-633-1348 if there are any questions.

cc John Prendergast
Gwen Baranus
Kate Joyce

Post-It® Fax Note	7671	Date	6/1/96	P. of pages	1
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